

REMARKS

Claims 8, 17-21 and 44 are cancelled without prejudice. New claims 45-47 are added that cover the subject matter of original claims 27-29.

The examiner rejected claim 14 as being indefinite under § 112. Claim 14 is amended to correct an inadvertently omitted word which gave rise to the indefiniteness. Additionally, minor nomenclature changes, e.g. changing “vessel” to “floating body” and “keel guide” to “bearing assembly,” are made to the claims to more clearly define the subject matter regarded by applicant as the invention.

The examiner rejected claims 1-14, 16-21, 23-26, 30-32, 34-37, 39, 41, 42, and 44 as anticipated by Peterson (U.S. 4,657,439). Independent claims 1 and 23 are amended to more clearly distinguish the subject matter that applicant regards as the invention. Peterson discloses a method for coupling a riser or umbilical to a moored floating body having a hull with a keel, the method comprising the steps of operatively coupling a lower end of a tubular member to a subsea well, longitudinally suspending an upper end of the tubular member from a first elevation above the hull, and laterally supporting the tubular member at a second elevation at the hull. However, in Peterson, the lateral support is provided by a buoyant member 27 which slides up and down in a vertical cylinder 31 as the waterline shifts. The applicant’s invention includes a lateral support that is fixed to the hull. Claim 1 as presently amended requires the lateral support elevation to be fixed with respect to the hull. Clearly, Peterson does not disclose this limitation. Likewise, claim 23 includes a limitation of a bearing assembly having a vertically oriented generally cylindrical passage for receiving a tubular member, the bearing assembly being fixed to the hull. Peterson’s bearing assembly is buoyant member 27, which clearly is not fixed to the hull because

it freely slides within buoyant member opening 31. Therefore, claims 1 and 23, and claims 2-7, 9-14, 16, 24-26, 30-32, and 34-35 depending thereon, are novel with respect to Peterson.

Furthermore, Peterson does not suggest the use of a fixed support, nor provide motivation therefor. “A method and apparatus therefore need to be developed that allows a riser to be passively tensioned by a buoyant member, without the inherent disadvantages mentioned previously in the use of such a member.” Peterson at col. 2 ll. 24-27. As Peterson requires a buoyant member, and suggests using only the buoyant member for support of the riser, Peterson does not provide motivation for a lateral riser support fixed to the hull.

The examiner rejected independent claim 36 as anticipated by Peterson, stating, “Re claim 36, the apertures do in fact have a closed periphery in one configuration.” Applicant respectfully disagrees. Peterson neither discloses nor suggests the use of two or more apertures vertically formed through the hull having closed peripheries. Rather, Peterson discloses only one vertical aperture with a closed complex periphery, the aperture consisting of vertical opening (the moonpool) 16 which forms a plurality of buoyant member openings 31. *Id.* at col. 4 ll. 66-67. Alternatively, Peterson can be considered to disclose a plurality of vertical apertures 31 that have open peripheries into the moonpool. Therefore, applicant respectfully traverses the rejection of claims 36-37, 39, 41 and 42 and requests reconsideration in view of the arguments presented above.

The examiner also rejected claims 1-5, 7-14, 16-21, 23-26, 30-32, 34, 35, and 44 as anticipated by Eie (U.S. 4,938,632). The examiner has kindly pointed out that the “riser or umbilicals” limitations in the applicant’s claims fail to define any specific structure and/or arrangements so as to define over the tendon elements 13 of Eie. Applicant has therefore amended independent claims 1, 12 and 36 to more specifically claim the subject matter applicant

regards as the invention. In each claim, "risers or umbilicals" is replaced with "tubular member," and the limitation that the tubular member has a lower end which is operatively coupled to or in fluid communication with a subsea well is added. Thus, the tubular members of the applicant's claimed invention are now arranged so as to be distinct from mooring tendons. As amended, claims 1 and 23 are now novel in view of Eie.

In summary, claims 1-7, 9-14, 16, 23-26, 30-32, 34-37, 39, 41-42, and 45-47 are pending in the application. As presented herein, these claims are believed to be new and unobvious over the cited prior art. Applicant believes the application is in condition for allowance. Applicant humbly requests the examination of the claims, consideration of the arguments herein, and passage to issue.

Respectfully submitted,



Brett T. Cooke
Reg. No. 55,836

Andrews & Kurth L.L.P.
600 Travis, Suite 4200
Houston, Texas 77002
713/220-3813 (office)
713/238-4285 (facsimile)
Customer No. 23,444

Date: February 9, 2006